BLM Colorado Comments

Cmt #	Page #	Reviewer Name	Reviewer Office/ Affiliation	Comment	Response / How Resolved *(Reviewers: Leave this column blank)*
1.	65	A. Stillings Socioecon	BLM COSO	Citing IMPLAN as the data source for economic activity seems odd with the way this is written up and isn't a data source that public can verify	
2.	66	A. Stillings Socioecon	BLM COSO	Remove space in crow ding in second row	
3.	67	A. Stillings Socioecon	BLM COSO	Do we want to any economic sector tracking at the county level (e.g., forestry, grazing, tourism) via Headwaters Economic Profile System to provide context? Appears to be on decade scale;	
4.	97	A. Stillings Socioecon	BLM COSO	Add to IMPLAN definition that it's an economic model – it's not social	
5.	10	F. Cook Air Qual	BLM COSO	for the air quality related "Guidelines" for meeting the standards on page 10...for FW-GDL-AQ-11, I would probably revise to read: "should not result in critical load exceedances and contribute significantly to visibility impairment in Class I and sensitive Class II areas, and contribute significantly (above project-level significant impact levels, etc.) to cumulative air quality concentrations at or near ambient air quality standard levels for proposed projects on Forest lands"...	

Cmt #	Page #	Reviewer Name	Reviewer Office/ Affiliation	Comment	Response / How Resolved *(Reviewers: Leave this column blank)*
6.	10	F. Cook Air Qual	BLM COSO	I also would probably add a new Guideline: FW-GDL-AQ-13 that reads something like: "for oil and gas projects on Forest land, work with the BLM Colorado including the use of BLM's online applications and tools to develop project-specific air pollutant emissions inventories and complete NEPA assessments..."	
7.		F. Cook Air Qual	BLM COSO	This preliminary draft includes a general reference to the 2018 air quality analysis that GMUG prepared (i.e., *Grand Mesa, Uncompahgre, and Gunnison National Forests REVISED DRAFT Forest Assessments: Air Quality March 2018)* that 2018 air quality analysis utilized CARMMS 2.0 but did not use CARMMS 2.5 which was a modeling effort completed just for the Forest Service...the GMUG Plan DEIS should use the CARMMS 2.5 products as they highlight GMUG's projected future oil and gas potential impacts to air quality and related values.	

Cmt #	Page #	Reviewer Name	Reviewer Office/ Affiliation	Comment	Response / How Resolved *(Reviewers: Leave this column blank)*
8.	Chapter 1	D. Maggie Magee Planning and NEPA	BLM CO SWD	**Chapter 1: Introduction** In general, I observed the following during my review of Chapter 1: I anticipated encountering many of the issues common in the early phases of plan development: Excessive and circular language, repetition, lack of clarity and organization (resulting in a need to reread explanations or entire paragraphs to ascertain intended meanings), and unsupported or poorly supported directives. I was therefore somewhat surprised to find that the preliminary Draft already contains the foundational groundwork necessary for an excellent plan. My sense is that the GMUG has strong writers and specialists on staff, has decent examples from which to draw, and makes effective use of boilerplate language when appropriate. - The language in the Draft Plan is succinct, clear, and highly readable. I found few instances in which language is either passive or not straightforward. - Source materials, plans, policies, and guidance are appropriately cited.	

BLM Colorado Comments

Cmt #	Page #	Reviewer Name	Reviewer Office/ Affiliation	Comment	Response / How Resolved *(Reviewers: Leave this column blank)*
9.	PP. 9 – 45	D. Maggie Magee Planning and NEPA	BLM CO SWD	The Desired Conditions, Objectives, Standards, and Guidelines provide an excellent framework for structuring management direction in a way that is clear and logical for the reader and would seem to benefit those developing the plan in better refining the Objectives, Standards, and Guidelines to meet the Desired Conditions.	

Cmt #	Page #	Reviewer Name	Reviewer Office/ Affiliation	Comment	Response / How Resolved *(Reviewers: Leave this column blank)*
10.	PP. 9 – 45	D. Maggie Magee Planning and NEPA	BLM CO SWD	**Wording of Objectives** For the most part, the draft Objectives are well written, although some are worded as actions, while others are more correctly worded as outcomes. And while all the Objectives include timeframes, not all include the quantifiable measures (i.e. percentage of, all of, acres of) that provide a solid path forward. Following are example Objectives from the Draft Plan that lack a measure [with examples of clarifying language]: **FW-OBJ-CHR-136:** Within 5 years of plan approval, [all] areas of Tribal importance, including discrete cultural landscapes, are spatially identified based on cultural affiliation, time period, and/or relationship with natural resources and features. **FW-OBJ-CHR-137:** Within 5 years of plan approval, [90% of] fire-sensitive cultural resource (e.g., historic structures, wickiups, and culturally modified trees) locations are identified in Heritage GIS in order to facilitate protective measures during wildland fire management. Following are examples of Draft Plan Objectives that are action-, rather than outcome-, oriented, along with suggested rewording: *Current Wording:* **FW-OBJ-TEV-25:** Within 10 years of plan approval, enhance the resiliency of alpine	

BLM Colorado Comments

Cmt #	Page #	Reviewer Name	Reviewer Office/ Affiliation	Comment	Response / How Resolved *(Reviewers: Leave this column blank)*
11.	p. 60	D. Maggie Magee Planning and NEPA	BLM CO SWD	**Chapter 4: Monitoring** Terms/jargon are explained well and related to the bigger picture so as not to detract from understanding. Example: The explanation of how adaptive management informs and is integral to forest plan monitoring is exceptionally clear and concise. I have seen the two concepts presented separately when they should be inextricably linked.	
12.		R. Sayre Planning and NEPA	BLM COSO	The BLM appreciates this opportunity to participate in this review of the Preliminary Draft Revised RMP for the Grand Mesa, Uncompahgre, and Gunnison N National Forests. This draft was well-prepared and followed a logical format. We look forward to participating in further review of this document and to working with the U.S. Forest Service with this planning effort.	
13.		R. Sayre	BLM COSO	As the primary federal land management agencies in the region, with management responsibilities for most of the land in the southern and western part of Colorado, there should be many opportunities for the USFS and BLM to work collaboratively and cooperatively, particularly in relation to considering connected actions or evaluation of cumulative effects.	

BLM Colorado Comments

Cmt #	Page #	Reviewer Name	Reviewer Office/ Affiliation	Comment	Response / How Resolved *(Reviewers: Leave this column blank)*
14.	6-7	R. Sayre Planning and NEPA	BLM COSO	The preliminary draft plan focused on actions on USFS lands, but could also address the important interagency opportunities for conservation and management, such as improving or maintaining connectivity corridors, threatened or endangered species management, watersheds and ecosystem management, or managing invasive species in areas where agency boundaries are adjacent or intersect. This planning effort will be an excellent opportunity for both agencies to work collaboratively toward similar goals. Something along these lines could be added to the final bullets of ***Commodity Use and Community Connections*** in Chapter 1.	